



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

*NO State or
Letter in System*

AFS 365-485-44

SEP 19 2007

Ref: EPR-N

Misty A. Hays
Deputy District Ranger
Douglas Ranger District
2250 E. Richards St.
Douglas, WY 82633

RE: Thunder Basin Vegetation Management
FEIS, Wyoming
CEQ#20070352

Dear Ms. Hays,

The U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Thunder Basin Analysis Area Vegetation Management Final Environmental Impact Statement (FEIS). Our comments are provided in accordance with our authorities under the National Environmental Policy Act (NEPA), 42 U.S.C 4231 and Section 309 of the Clean Air Act. The U.S. Forest Service proposes to implement an updated vegetation management plan in three geographic areas within the Thunder Basin National Grassland, with the stated objective of resolving disparities between current conditions and the desired conditions specified in the Thunder Basin National Grassland Land Resource Management Plan. The preferred alternative, Alternative C, would implement best management grazing practices and activities associated with adaptive management and monitoring strategies to accomplish this objective.

EPA finds that the actions proposed by the FEIS require more development to adequately anticipate and mitigate environmental impact. We reiterate our comments from the draft EIS, as they do not appear to have been addressed by the Forest Service in the FEIS. In general, EPA's concerns with the FEIS center on the degree of planning and commitment to adaptive management activities, the evaluation of riparian area health and water quality and the lack of a cohesive and proactive drought-management plan.

In Section 1.3.4, Purpose (Objectives), Desired Conditions, under Purpose and Need, one cited purpose of the vegetation management plan is, "improve and protect watershed conditions to provide the water quality and quantity and soil productivity necessary to support ecological functions and intended beneficial water uses. Permanent and repeatable transects and photo points would be established or re-measured to monitor long term riparian area health." However, in Section 3.7, Hydrology, it is noted that several reaches of the Upper Cheyenne River watershed are rated "Functional - At Risk" with respect to geology, soil, water and vegetative conditions. EPA is concerned that the heavy emphasis on monitoring and the apparent deferment of riparian management to such time as a trend is discernable introduces an unnecessary lag

In Section 3.11.1, Soils, Affected Environment, Methods, visual inspections are cited as the principal method to assay soil quality and erosion. EPA suggests that visual inspection be supported by quantitative measurements of soil quality, such as compaction, aggregate size, organic carbon content, productivity and bulk density. Given the wide extent of soils rated "Unsatisfactory" in the analysis area, EPA suggests that future adaptive management activities include quantitative soil quality monitoring to track trends and changes in soil quality over time.

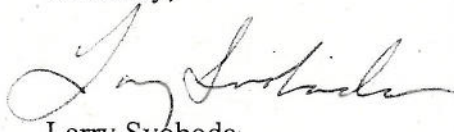
Under Section 2.5, Design Criteria for Alternative 3, the Adaptive Management Alternative (pg. 24), the FEIS specifies rest periods of 1-10% of all suitable rangeland. EPA is concerned that this rest period may be insufficient for adequate regeneration of biomass and vegetation structure, particularly in disturbance-sensitive areas, areas at risk for non-native species invasion, drought-stressed areas and riparian areas. The Final EIS does not provide science demonstrating that this rest scheme will protect vegetation from overutilization and soil from erosion and quality loss.

In Appendix B, Table 2B, Effectiveness Monitoring Schedule, Frequency and Responsibility, the FEIS specifies 3-5 year monitoring intervals for riparian and sensitive habitat and for vegetation structure and seral stage trends and 5-10 intervals for monitoring of Term Grazing Permit compliance. EPA is concerned that this interval will not allow managers to sufficiently respond to rapidly changing conditions. It is unclear that this monitoring scheme represents an improvement on current monitoring schemes, and that the monitoring interval will provide sufficient data to inform a responsive, truly adaptive, grazing management strategy. Additionally, it remains unclear to what degree resources have been committed to these management activities.

The apparent lack of response to the comments submitted by the EPA, and the publication of this FEIS within days of the close of the comment period, do not indicate a strong commitment to responding to the comments of participating agencies and the public. The FEIS does not apparently include any substantial changes from the draft version, and does not include a response to public or agency comment. While these actions hew to the letter of the NEPA process, they do not adhere to its spirit.

These comments are intended to help ensure a comprehensive assessment of the project's environmental impacts, adequate public disclosure and an informed decision-making process for alternative selection. If you would like to discuss our comments, please feel free to contact me or the lead reviewer for this project, Charlie Lawton, at (303) 312-7037.

Sincerely,



Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

cc: Marilee Houlter, Douglas Ranger District, US Forest Service

